

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO (Cleveland)  
CASE NO.: 1:05-CV-02466-PAG

DISABLED PATRIOTS OF AMERICA,  
INC., a Florida not-for-profit corporation,  
and MICHAEL MILES, Individually,

Plaintiffs,

vs.

BRIGHTON MANOR COMPANY  
d/b/a HOLIDAY INN SANDUSKY-  
CEDAR POINT AREA,

Defendant.

**STIPULATION FOR APPROVAL AND ENTRY OF  
CONSENT DECREE AND DISMISSAL OF CASE WITH PREJUDICE**

Plaintiffs and Defendant, by and through undersigned counsel, hereby move this court to approve and enter judgment on the Proposed Consent Decree annexed hereto as Exhibit A ("the Consent Decree").

Pursuant to Title III of the Americans with Disabilities Act this Court is authorized to enter a Consent Decree requiring a public accommodation to alter facilities to make such facilities readily accessible to and useable by individuals with disabilities to the extent required by Subchapter III of Chapter 126 of Title 42 of the United States Code. 42 USC § 12188 (a)(2) 2000.

Wherefore, Plaintiffs and Defendant respectfully request this Court to approve and enter judgment on the Consent Decree and retain jurisdiction to enforce the Consent Decree and Dismiss the Case with Prejudice.

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Date: 5-19-06

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**WITH EXPRESS AUTHORIZATION**

By: /s/ Daniel P. Petrov

Daniel P. Petrov, Esq.  
Counsel for Defendant

Date: 5-19-06

So Ordered.

/s/ Patricia A. Gaughan  
5/22/06